

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Michael Nawrocki
Title: Principal MTS - Technology

REQUEST: WorldCom, Inc. ("MCI"), Set #1

DATED: December 30, 2003

ITEM: MCI 1-2

Has Verizon deployed or does it have plans to deploy any "Auto MDF (Robotic Controlled Cross Connection)" devices in Massachusetts? If yes, with respect to each "Auto MDF (Robotic Controlled Cross Connection)" device deployed or planned to be deployed, please provide the following information:

- a. the manufacturer, make, model and configuration.
- b. all engineering documentation evaluating the equipment prior to its selection.
- c. all documentation relating to the equipment, including documentation provided by access to a secured web site, provided by the equipment vendor, including, but not limited to. Documents relating to equipment installation, operation, expansion, and maintenance of the Robotic MDF referenced in the response.
- d. any analysis, including, but not limited to, cost/benefit analysis, labor savings analysis, payback analysis, present value analysis and any internal rate of return and any other business or financial analysis, associated with the selection, budgeting, purchase, installation and operation of the Robotic MDF.
- e. all training materials related or associated with the Robotic MDFs.
- f. the network plan for additional installations in 2004, and for installations in 2005.

ITEM: MCI 1-2 Cont'd

- g. If the answer to the introductory part of this request is no, please provide the information requested in (a) through (f) for each state where Verizon has deployed this device.

REPLY:

- a. Please see Verizon MA's reply to AT&T 2-61e.
- b., c., d., f. Verizon MA objects to parts b, c, d, and f of this Information Request on the grounds that these requests are overly broad and seek information that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, and without waiving them, attached is a copy of a Verizon Network Planning Document #NP-AL-2002-106, Issue #1, September, 2002. The information provided in the attachment is proprietary, confidential and competitively sensitive, and is being provided in accordance with the terms of the Department's Protective Order.
- e. The requested documentation may not be disclosed without the written consent of the vendor. Verizon MA is investigating the scope of the restrictions imposed on Verizon and whether the vendor would be willing to agree to such disclosure.
- g. Not applicable.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: John Livecchi

Title: Director Network Engineering

REQUEST:

WorldCom, Inc. ("MCI"), Set #1

DATED:

December 30, 2003

ITEM: MCI 1-6

Please provide the following information specific to each wire center in Verizon's Massachusetts service territory:

- (a) total number of active voice grade loops;
- (b) total number of active voice grade loops served by home-run copper;
- (c) total number of active voice grade loops served by digital loop carrier;
- (d) total number of active voice grade loops served by integrated digital loop carrier (as a sub total of c.);
- (e) total number of active voice grade loops served by direct fiber-to-the-premise technology;
- (f) total number of active voice grade loops served by other technologies. Please describe "other technologies" that constitute your response to question f.

REPLY:

- (a) – (d) Verizon MA objects to this request on the grounds that the request is vague and ambiguous. Notwithstanding its objections, Verizon MA responds as follows. Please see the attached (Attachment MCI 1-6). The information provided in the attachment is proprietary, confidential and competitively sensitive, and is being provided in accordance with the terms of the Department's Protective Order.
- (e) Verizon MA has not deployed direct fiber-to-the-premises technology.
- (f) The "other technologies" referenced on MA MCI Attachment 1-6 are fiber-to-the-curb.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Jim McLaughlin

Title: Executive Director - Operations

REQUEST: WorldCom, Inc. ("MCI"), Set #1

DATED: December 30, 2003

ITEM: MCI 1-12

- (a) Please provide the average number of CO Frame, RCCC, Field, NMC, and RCMAC personnel presently on the payroll.
- (b) Does the FLM calculate the incremental force required over and above the number of employees presently performing these activities?

REPLY:

- (a) Please see the attached (Attachment MCI 1-12). The information provided in the attachment is proprietary, confidential and competitively sensitive, and is being provided in accordance with the terms of the Department's Protective Order.
- (b) Yes.